

Before the POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

Complaint Regarding Postal Service Offering DOCKET # MC2012-26  
ENHANCED SERVICES PRODUCT FOR COMPETITIVE PO BOXES

COMMENTS OF ISLAND PACKAGING & SHIPPING  
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I am the owner of a small business that is a Commercial Mail Receiving Agency (CMRA) and have some comments about the United States Postal Service venturing into additional services for their PO Boxes.

The service of email notification, being offered by the USPS, is a new service. The USPS has not offered this service in the past. This service requires labor and technology to implement and maintain. These items have a cost and to say they are included in the base cost of a PO Box, when the service is new, contradicted the statements made by the USPS that they are already providing this service and that they are bundled into the PO Box rental fee.

The second new service that is now being offered is street addressing for private carrier delivery to the PO Box. Street addressing costs and logistics involved do not justify a no charge bundling of this service. By the USPS's own admission there is a cost involved in moving those packages from a receiving area to the delivery area. If there is cost then there needs to be postage to cover those costs. I cannot hand mail, directed to the local postmaster, to my letter carrier for internal delivery to a postmaster without placing a stamp on it, so everything handled by USPS personnel needs some sort of postage. While there has been a 25% increase in pricing nothing in the USPS filing shows a breakdown of costs to prove that the costs of implementing these specific new additional services is covered by the increase.

Here is a list of our competitive disadvantages we live with under the very unfair CMRA regulations imposed on us by the USPS.

1. Stores must handle mail for 6 months for departed and or canceled customers. The regulation also places additional cost of putting new postage on anything received during those 6 months when the mail is forwarded or returned. The cost to pay for this postage can be very high. Prospective new mailbox customers are discouraged from establishing service at an MPC store because of the possible costs involved.
2. MPC's are saddled with the expense of providing lists of current and former customers including the date the service was terminated to the Postal Service 4 times per year. These lists require expensive computer systems to create and maintain them.
3. The required lists are to be used by Postal Workers to determine if the mail coming to an MPC is for customers who have filed the proper 1583 forms. Instructions from the Postal Services POM permit Postal Workers to return mail for addressees that does not have the proper addressing format or if the addressee is not on the current customer list without notice to the MPC owner or their mail receiving customer. Big problem is the no notice regulation because these lists are filed once every 90 days. A store could have a current and valid new customers mail returned by the Postal Service because the list they have could be up to 89 days old.
4. We are required to give lists of our current customers to the Postal Service who now chooses to be in direct competition against our stores. There is currently no restriction that would keep the Postal Service from using these lists to contact our customers and try to sell them the new Enhanced PO Box services.
5. Some stores also carry the burden of storing mail for former customers for six months.
6. Our customers are restricted from ever filing a change of address with the Postal Service when their service contract ends at a CMRA.

7. The Postal Service can forward or return mail for former PO Box customers without additional postage and their PO Box customer can use the forwarding service while they are current Postal Service P O Box customers and not have to pay new postage charges to have their mail temporarily forwarded from their P O Box address.

8. A CMRA is not permitted to send out going Registered Mail for their mail-receiving customers. See form 1583A

9. The Postal Service can return legitimate CMRA customers mail for lack of the proper designation with no notice to the addressee or storeowner.

10. CMRA customers lose the right to refuse any or all of their mail. MPC owners are required to accept all mail for current and former customers. There is no distinction made to exempt things like certified and registered mail.

11. When an MPC is abandoned or closed the regulations clearly state a CMRA customer may file a change of address. In many cases customers are still not permitted to file the change by postal officials who don't understand the CMRA regulations that the Postal Service has on the books.

12. A CMRA can have all mail delivery suspended because of the actions of just one of their mail receiving customers. We can be found to be out of what is called full compliance just because one customer is receiving mail with the word "suite" in the address. Even if the customer is unable to get the mailer to stop using the term suite.

13. CMRA customers can face suspension of their mail services with little or no notice. The regulations say only two Postal Officials are needed to find an MPC store out of compliance and all of a store's mail can be stopped because of the actions of just one of the MPC store's mail receiving customers. There's no hearing process nor any sort of appeal can be filed. Plus there is no process for the MPC owner to get mail delivery reinstated after their mail delivery has been suspended.

14. Criminals and Prisoners have better rights when receiving mail than a customer at an MPC.

15. A CMRA address cannot be used to have mail forwarded to on a permanent basis. Only a PO Box at the Post Office can be used as the permanent new address.

In conclusion email notification and street addressing as premium service doesn't seem to be what the public wants. With 66,000 mailbox customers canceling or not renewing in the first 6 months of the program it raises the question of what the PO Box customer really wants.

In my experience the PO Box customer wants an inexpensive place to receive their mail and generally know when their mail is placed in the PO Box. These services are adding costs to people and businesses who are value purchasers rather than convenience and service customers. For all the reasons I have outlined I feel that these services are not benefiting the USPS and in fact have the chance of further damaging the high standards the USPS operates under.

Thank you for your consideration on this matter.

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